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**From:** /O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE/GUID=789DFC9F-EF5B-4006-8896-6DFF5CE4F5A1 [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5CDCE5D7363046D9BD9D38C03DB940E9-STACEY GROCE/GUID=789DFC9F-EF5B-4006-8896-6DFF5CE4F5A1]  
**To:** Groce, Stacey [Groce.Stacey@epa.gov]  
**Subject:** Clothianidin Response to Comments!!!!  
**Attachments:** FL140007\_Belay\_ Clothianidin Review Summary Sheet, 01-27-22.docx; Clothianidin Respose to CBD\_Acres Florida Citrus Treated with Clodianidin (2014-2021).pdf; EPA-HQ-OPP-2021-0952\_1.docx; EPA-HQ-OPP-2021-0952-0005\_attachment\_1.pdf; 14FL03 Signed Memo clothianidin citrus.pdf; Section 18 for clothianidin soil drench applications in citrus in Florida3922.docx; 14FL03\_Application.pdf

Third, the EPA's proposed decision to *double* the amount of clothianidin to be used on citrus is arbitrary and capricious because it appears to be based solely on stale information from 2014 and no additional information since then.

The EPA cannot justify increasing the pounds of clothianidin approved for emergency use per year from 25,037 pounds to 50,150 pounds without data that necessitates this change.

It cannot arbitrarily increase the max rate of application from 0.2 pounds per acre to 0.4 pounds per acre without evaluating current evidence of this need. However, the EPA has not analyzed any current data whatsoever on the conditions necessitating this purported increase in emergency authorization.

The Applicant proposes to make no more than two applications of clothianidin at a maximum rate of 0.4 lb. a.i./A (24.0 fl. oz per acre) per 12- month period on up to 125,376 acres of immature (3–5 years old) citrus trees grown in Florida from January 14 to October 31, 2022.

A total of 50,150 lbs. of clothianidin could be used on the maximum acreage of 125,376 at the highest rate.